

(419) 352-8468 Fax

EPA Region 5 Records Ctr.



313510

>>> <Kelly.Brian@epamail.epa.gov> 1/21/2009 2:27 pm >>>
Matt,

Below are EPA's comments to the Southern Illinois Railcar - Initial Site Assessment.

General Comment: the guiding standards are in Ohio Administrative Code Section 3745-1-07. <http://www.epa.state.oh.us/dsw/rules/01-07.pdf> The standards are based on water use designation, temperature and pH. Warrington Ditch has a default use designation of warm water habitat therefore, Tables 7-2 and Table 7-5 are applicable. Typical pH and temperatures for streams in this area are as follows:

	pH	Temp
Summer	7.6 S.U.	23 C
Winter	7.6 S.U.	10 C

Thus the ammonia-wasteload criteria is:

	Maximum	Average
Summer	13 mg/l	6.6 mg/l
Winter	13 mg/l	1.8 mg/l

I do not plan to micro-manage how Allied chooses to achieve this criteria. The items I am most interested in seeing in a work plan are 1) a statement outlining the above criteria, 2) a schedule for completion of the work, 3) commitment to maintain water management until water quality standards are met, and 4) a monitoring/sampling program that shows the criteria has been achieved.

Specific Comments:

* The rationale for selection of the cited thresholds for action (i.e. 200 mg/kg, 300 mg/kg, and 1,000 mg/kg) should be included: i.e. is this Ohio EPA criteria, guidance, or calculated site-specific thresholds, or is this professional judgement?

* The report does not discuss horizontal extent of contamination or further defining the horizontal extent for the purposes of a response action. Will this be discussed/addressed in subsequent planning documents or further investigation?

* The verb tenses in the discussion of completed tasks need to be changed in several locations to make it clear this work was done; i.e. Section 3.1.2, 3.1.3, etc "soil borings will be advanced".

* 3.2.2: please indicate the depth of refusal in the second paragraph.

* 3.2.8 please indicate the allowed concentrations.

* The rationale for selection of the chemical analyses for each of the media sampled should be discussed in more detail.

* Schedule states January 19th as the start date, did activities begin?

FIGURES

* Please show the water sample locations on Figure 2 or provide an additional figure.

* The soil boring description in the legend for Figure 2 indicates these are proposed - please make it clear these were actual locations as appropriate.

* The predominant wind direction on Figure 3 would be helpful.

* It would be helpful to have a figure specifically showing the locations with ammonia concentrations over the thresholds determined for response actions. It would also be helpful to have cross sections depicting the source areas.

TABLES

* The water sample data from the lab is missing from the lab reports.

Sincerely,